



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20543

RQ-2

Gary R. Elsass, Treasurer  
Ohio Democratic Party Federal  
Campaign Account  
37 West Broad Street  
Columbus, OH 43215

MAR 23 1994

Identification Number: C00016899

Reference: Year End Report (7/1/93-12/31/93)

Dear Mr. Elsass:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-The beginning cash balance of this report should equal the ending balance of your 1993 Mid-Year Report. Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-Your calculations for Line 8 appear to be incorrect. Cash-on-hand at the close of the current reporting period should always equal the closing calendar year-to-date cash-on-hand amount. Please provide the corrected total on the Summary Page.

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of administrative and generic voter drive costs. This ratio is determined at the beginning of each two-year election cycle. All shared administrative and generic voter drive costs incurred during the two-year cycle must be allocated according to this ratio, unless the federal account elects to pay a higher percentage of its cost. 11 CFR §106.5(b)(2), (d)(1), (d)(2) and 11 CFR §§104.10(b)(1)(ii)(B) and 106.5(c)

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11

CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

-Please provide a Schedule H3 to support the entry reported on Line 18 of the Detailed Summary Page. All transfers received from a committee's non-federal account for joint activity must be itemized on Schedule H3 regardless of the amount transferred. 2 U.S.C. §434(b)(3)(D)

-Your calculations for Lines 21(a)(i) through (c) appear to be incorrect. FEC calculations disclose these amounts to be \$98,873.11, \$260,349.55 and \$359,222.66 respectively. Please provide the corrected totals on the Page.

-Schedule A of your report (pertinent portion(s) attached) discloses a contribution(s) from an organization(s) which is not a political committee registered with the Commission. In order for your committee to accept contributions from unregistered organizations into accounts used to influence federal elections, your committee should take steps to insure that the contributor(s) used permissible funds to make the contribution(s) to avoid violating 2 U.S.C. §§441a(f) and 441b or 11 CFR §102.5(b). Under 11 CFR §102.5(b), organizations which are not political committees under the Act and choose to contribute to federal committees must either: 1) establish a separate account which contains only those funds permitted under the Act, or 2) demonstrate through a reasonable accounting method that the organization has received sufficient funds subject to the limitations and prohibitions in order to make the contribution.

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. In addition, please clarify whether the contribution(s) received from the referenced organization(s) is permissible. To the extent that your committee has received impermissible funds, the Commission recommends that you transfer the impermissible funds to an account not used to influence federal elections or refund the impermissible amount(s) to the donor(s) in accordance with 11 CFR §103.3(b). The Commission recommends that you inform the contributor(s) in writing to provide the donor(s) with the option of receiving a refund or granting written authorization for a transfer to another account.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. Should you choose


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to transfer-out or refund the contribution(s), the Commission will presume the funds were impermissible if no statement from your committee provides information to the contrary. Transfers-out and refunds should be disclosed on a Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee in transferring-out or refunding the amounts will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Terry Reynolds  
Reports Analyst  
Reports Analysis Division

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## SCHEDULE A

## ITEMIZED RECEIPTS

Use separate schedule(s)  
for each category of the  
Detailed Summary PagePAGE OF  
FOR LINE NUMBER  
12

Any information copied from such reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ohio Democratic Party Federal Campaign Account

Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Association of State Democratic Chairs 430 S. Capitol St. Washington, DC 20003	Association of State	08/18/93	\$ 20600.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 110002.78	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Medina County Democratic Party P O Box 583 Medina, OH 44258	Medina County Democratic	08/23/93	\$ 1000.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 1000.00	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Democratic State Party Victory Fund 430 S Capitol St SE Washington, DC 20003	Democratic State Party	08/31/93	\$ 4878.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 11871.25	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Ottawa County Democratic Party 531 Laurel Ave Port Clinton, OH 43452	Ottawa County Democratic	11/03/93	\$ 400.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 1000.00	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Ross County Democratic Party 280 E. Main St. Chillicothe, OH 45601	Ross County Democratic	11/03/93	\$ 1000.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 1000.00	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Association of State Democratic Chairs 430 S. Capitol St. Washington, DC 20003	Association of State	11/15/93	\$ 11400.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 121402.78	
Full Name, Mailing Address and ZIP Code	Name of Employer	Date	Amount of Each Receipt this Period
Licking County Democratic Party	Licking County Democratic	12/08/93	\$ 1000.00
	Occupation		
Receipt for Non-federal Election Year	Aggregate YTD	\$ 1000.00	

TOTAL This Period (last page this line number only)

\$ 40076.00

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